

AO 106 (Rev. 04/10) Application for a Search Warrant

# UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

First Class Package, USPS Tracking Number: 9400  
1096 9993 9865 6813 90

Case No. 1:19-mj-288

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):  
First Class Package, USPS Tracking Number: 9400 1096 9993 9865 6813 90 (See Attachment "A")

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

Firearms parts or accessories

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
18 U.S.C. 922(g)(1)

Offense Description  
Possession of a Firearm by a Convicted Felon

The application is based on these facts:  
See attached affidavit of U.S. Postal Inspector Andrew W. Kremer

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Andrew W. Kremer, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/15/19

Judge's signature

City and state: Cincinnati, Ohio

Candace J. Smith, U.S. Magistrate Judge

Printed name and title

### AFFIDAVIT

I, Andrew W. Kremer, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since May 19, 2012. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. Your Affiant completed United States Postal Inspection Service Basic Training in May 2012. The training involved the use of investigative techniques. Your Affiant has worked since May 2012 with various federal, state and local law enforcement agencies in the investigation of the various types of criminal offenses.
3. This Affidavit is made in support of a search warrant for the following property, namely a package associated with the following United States Postal Service (USPS) First Class Package, USPS Tracking Number:

**a. 9400 1096 9993 9865 6813 90 (the "Package")**

as further described in Attachment A. This affidavit is made in support of a warrant to search the package for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offenses:

- a. Possession of a Firearm by a Convicted Felon, in violation of Title 18 U.S.C. Section 922(g)(1).

Because this affidavit is submitted in support of the application of the United States to search the package, it does not include every fact known concerning this investigation, I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the above-described package. The package is currently located at the USPIS Cincinnati Field Office.

4. On or about March 2019, your Affiant received information from a Homeland Security Investigations (HSI) Special Agent that HSI had information about the illegal importation from China of Glock conversion devices that were designed to convert semiautomatic Glock pistols into a fully automatic firearm. These machine parts, even in the absence of a Glock pistol, are considered prohibited items under the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defined, in pertinent part, as "any part designed and intended solely and exclusively, or combination of parts designed and intended for use in converting a weapon into a machine gun." These devices were being delivered in the United States by the United States Postal Service. The HSI Special Agent provided information that the



examination of several of the inbound packages yielded positive results for the Glock conversion devices.

5. The HSI Special Agent provided your Affiant with USPS Tracking Number: LN655797152CN, which Customs and Border Patrol (CBP) records indicate this package was addressed to Jack Seay, 538 Betton St., Cincinnati, OH 45214 with a return address of TAOZHENGMIN ROOM B312 3TH FLOOR OF 34 BUILDING DAHE INDUSTRIAL AREA HUANGUAN SOUTH ROAD GUANLAN STREET SHENZHEN, China. CBP and HSI records indicate this shipper is associated with multiple seizures by law enforcement of the counterfeit Glock full auto conversion devices, to include at least two (2) seizures of Glock conversion devices, which occurred in the Southern District of Ohio. Your Affiant queried USPS business records which indicated LN655797152CN had been delivered on October 22, 2018 with a delivery status of "Delivered, In/At Mailbox."
6. On or about April 9, 2019, during a review of USPS mailings your Affiant identified a package in the US Mail Stream addressed to Jack Seay, 538 Betton St, Cincinnati, OH 45214.

The package is further described as:

**First Class Package, USPS Tracking Number:** 9400 1096 9993 9865 6813 90

**Sender:** DOWN RANGE PRODUCTS CO  
8820 MONROVIA ST, PO BOX 14156  
LENEXA KS 66215-3539

**Addressee:** JACK SEAY  
538 Betton St  
Cincinnati, OH 45214-2710

7. Your Affiant conducted a google.com search for DOWN RANGE PRODUCTS CO. The results of the search revealed a website [www.downrangeproductsco.com](http://www.downrangeproductsco.com). On the "Contact Us" web page it indicates an address of PO Box 14156, Lenexa, KS 66215. The "About Us" web page indicates that DOWN RANGE PRODCUTSCO is a manufacturer and retailer of high quality firearm parts and accessories. The web page indicates DOWN RANGE PRODUCTS makes the following firearm parts and accessories: barrel thread protectors for pistols and AR platform rifles, crush washers, jam nuts, muzzle breaks, flash hiders, and barrel indexing shims for firearms.
8. A USPIS Contractor utilized postal business records and determined the postage meter used for the shipping of the Package was an Ebay meter. Your Affiant located an Ebay store called "DOWN RANGE PRODUCTS." Your Affiant reviewed the items for sale on the Ebay store "DOWN RANGE PRODUCTS" and the items for sale on the Ebay

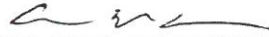
store are similar to that of the items for sale on [www.downrangeproductsco.com](http://www.downrangeproductsco.com). Furthermore, both the Ebay site and website have pictorially similar signage.

9. The Consolidated Lead Evaluation and Reporting (CLEAR) database system was researched by your Affiant regarding the listed addressee, JACK SEAY, 538 Betton St, Cincinnati, OH 45214-2710. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated that JACK SEAY was last associated with that address in May 2017. However, your Affiant has reviewed postal business records which indicate that Jack Seay has been the addressee name on three (3) USPS packages that have been delivered to 538 Betton St, Cincinnati, OH 45214 since March 2019.
10. On or about April 10, 2019, your Affiant intercepted the package at the USPS Network Distribution Center, Cincinnati, Ohio.
11. On or about April 10, 2019, your Affiant received a report from Alcohol Tobacco and Firearms (ATF) in regards to Jack Seay. The report indicated that on August 22, 2002, a bag was found by a maintenance man for a realty company. ATF and Cincinnati Police Department (CPD) reviewed the contents of the bag. Inside of the bag was a video tape reference improvised suppressors, video tape reference homemade C4, handgun and submachine gun book, silence for firearms book, fighting skills of the SAS book, books in reference to silencers, detonating devices, micro UZI, and semtex, a bus card, car title, birth certificate, and other items. The bus card, car title, and birth certificate were all under the name Jack Seay. The report further indicated that Jack Seay has three prior felony convictions punishable by a term of imprisonment exceeding one year in the Hamilton County Court of Common Pleas for: Having weapons while a fugitive and armed robbery, Having weapons while under disability, and drug abuse. Therefore, Jack Seay is prohibited from possessing firearms under 18 U.S.C. § 922(g)(1).
12. Based upon the information contained in this affidavit, your Affiant believes that there is probable cause to believe that the package described below will contain a part or accessory for a firearm. The addressee on the Package is a prohibited possessor of firearms and therefore should have no legitimate reason to be receiving firearms parts or accessories. Therefore, your Affiant believes that the package described below contains evidence of a crime as well as contraband, fruits of a crime, or other items illegally possessed in relation to the offense Possession of a Firearm by a Convicted Felon in violation of 18 U.S.C. § 922(g)(1).

**a. First Class Package, USPS Tracking Number: 9400 1096 9993 9865 6813 90**

Therefore, a search warrant to open the package is requested.

Further, your Affiant sayeth naught.



Andrew W. Kremer  
United States Postal Inspector

Subscribed and sworn to and before me this 15<sup>th</sup> day of April, 2019



Candace J. Smith  
United States Magistrate Judge

**ATTACHMENT A**  
**PROPERTY TO BE SEARCHED**

The property to be searched is the package associated with **First Class Package, USPS Tracking Number: 9400 1096 9993 9865 6813 90**, addressed to JACK SEAY, 538 Betton St, Cincinnati, OH 45214-2710 with a return address of DOWN RANGE PRODCUTS CO, 8820 MONROVIA ST, PO BOX 14156, LEXEXA, KS 66215-3539.